

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/JFD)

This Document Relates to:

ALL CONSUMER INDIRECT
PURCHASER ACTIONS

**DECLARATION OF ASHLEA
SCHWARZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND LITIGATION EXPENSES
SUBMITTED ON BEHALF OF
PAUL LLP**

I, Ashlea Schwarz, hereby declare and state as follows:

1. I am a partner of Paul LLP. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
2. My firm and I serve as Counsel in this matter for Plaintiffs.
3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the periods: (1) from the inception of the case through December 31, 2022, and (2) from July 1, 2021 through December 31, 2022. The total number of hours spent by my firm from the inception of the case through December 31, 2022 was 71.4 with a corresponding current lodestar of \$27,667.50.¹ The total number of hours spent by my

¹ Such time does not include any time expended in completing this declaration.

firm from July 1, 2021 through and including December 31, 2022 was 28.9 with a corresponding current lodestar of \$9,040.00.² This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by the firm. The lodestar amount reflected in **Exhibit 1** is for work assigned by Plaintiffs' Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time periods. In preparing this time, I followed Co-Lead Counsel's protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing Plaintiffs in the Action, from July 1, 2021 through December 31, 2022 my firm communicated with numerous class representatives to collect responses to propounded discovery, including written responses and documentation of purchases. My firm also organized email searches, coordinated the logistics of class representative depositions, and attended one deposition. The hourly rates for the attorneys and professional staff in my firm reflected in **Exhibit 1** are the usual and customary hourly rates charged by my firm in similar complex litigation matters.

4. From July 1, 2021 through December 31, 2022, my firm has expended a total of \$45.19 in unreimbursed costs and expenses in connection with the prosecution of the Action. These costs and expenses are set forth in the chart attached as **Exhibit 2** and reflected on the books and records of my firm. The costs and expenses from July 1, 2021 through and including December 31, 2022 were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

² Such time does not include any time expended in completing this declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 16, 2023 in Kansas City, Missouri.

/s/ *Ashlea Schwarz*

EXHIBIT 1**FIRM NAME****Reported Hours and Lodestar for the Entire Case Period**

Inception of the case through December 31, 2022

| Timekeeper | Professional Status | Hours | Current Rate | Total Lodestar |
|--------------------|---------------------|-------|--------------|----------------|
| Richard Paul III | P | 3.4 | 825 | \$2,805 |
| Ashlea Schwarz | P | 9.7 | 700 | \$6,790 |
| Sean Cooper | P | 8.2 | 625 | \$5,125 |
| Kyle Taylor | A | 10.2 | 300 | \$3,060 |
| Kendra John | PL | 4.3 | 275 | \$1,182.50 |
| Linda Davis | PL | 5.5 | 250 | \$1,375 |
| Patrick Neal | PL | 26.2 | 250 | \$6,550 |
| Andrea Herron | LC | 3.9 | 200 | \$780.00 |
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| Grand Total | | 71.4 | | \$27,667.50 |

Reported Hours and Lodestar Following the JBS Settlement

July 1, 2021 through December 31, 2022

| Timekeeper | Professional Status | Hours | Current Rate | Total Lodestar |
|--------------------|---------------------|-------|--------------|----------------|
| Ashlea Schwarz | P | 2.9 | 700 | 2030.00 |
| Kyle Taylor | A | 10.2 | 300 | 3060.00 |
| Patrick Neal | PL | 15.8 | 250 | 3,950.00 |
| | | | | |
| | | | | |
| Grand Total | | 28.9 | | \$9,040.00 |

Role Legend

P Partner/Shareholder
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

Exhibit 2**FIRM NAME****Expenses Incurred between July 1, 2021 through December 31, 2022**

| Expense Category | Amount Incurred |
|--|----------------------------|
| Electronic Research (Lexis/Westlaw/PACER) | 15.10 |
| Court Costs – Filing Fees | |
| Litigation Fund Contribution | |
| Express Delivery/Messengers | |
| Photocopies – In House | 26.95 |
| Photocopies - Outside | |
| Postage | 3.14 |
| Service of Process Fees | |
| Telephone / Fax | |
| Transportation / Meals / Lodging | |
| Experts/Consultant Fees | |
| Court Reporter Service/Hearing Transcript Fees | |
| TOTAL EXPENSES | 45.19 |